

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY, LLC, <i>ET</i> <i>AL.</i>, Debtors.¹	§ § § § § § §	Chapter 11 Case No. 20-33948 (MI) (Jointly Administered)
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**SUPPLEMENTAL VERIFIED RULE 2019 STATEMENT OF MULTIPLE PARTY
REPRESENTATION**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, Husch Blackwell LLP and Chiesa Shahnian & Giantomasi PC (together, “**Counsel**”), file this Supplemental Verified Rule 2019 Statement of Multiple Party Representation (“**Supplemental Verified Statement**”) to provide the following supplemental information:

1. On September 16, 2020, Counsel filed a Verified Rule 2019 Statement of Multiple Party Representation disclosing its representation of Everest Reinsurance Company, Aspen American Insurance Company, and Berkley Surety Company. [Dkt. 362].
2. Counsel has subsequently been retained to represent Sirius America Insurance Company (“**Sirius**”). Sirius is a creditor of the Debtors or is a party-in-interest, and the nature and total principal amount of its claims is described on **Exhibit A** attached hereto.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

3. Each of the parties listed on **Exhibit A** has consented to this multiple representation by Counsel in the above-captioned matter.

4. Counsel reserves the right to amend this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 16, 2020.

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Randall A. Rios

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**ATTORNEYS FOR EVEREST
REINSURANCE COMPANY, ASPEN
AMERICAN INSURANCE COMPANY AND
BERKLEY SURETY COMPANY**

CERTIFICATE OF SERVICE

I certify that on October 16, 2020, a copy of this document was served by electronic service on all counsel of record via the Court's CM/ECF system.

/s/ Randall A. Ríos
Randall A. Ríos

EXHIBIT A

Name and Address	Nature of Claim against the Debtors	Total Bond Liability (Exclusive of Interest, Costs and Attorneys' Fees)
Everest Reinsurance Company	Surety Bonds	\$95,570,822.00 ²
Aspen American Insurance Company	Surety Bonds	\$19,197,079.00
Berkley Surety Company	Surety Bonds	\$74,023,611.20
Sirius American Insurance Company	Surety Bonds	\$46,476,369.00

² Although Bond ES00001441 was written by Everest Reinsurance in the amount of \$75,000,000.00, HCC International Insurance Company PLC (“HCC”) assumed \$50 million of the potential penal sum exposure pursuant to that certain Surety Claim Sharing Agreement between Everest Reinsurance and HCC.